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Via First Class, Certified Mail, Return Receipt Requested

Springfield City Council and Lane County Board of Commissioners  
c/o Linda Pauly, [lpaul@springfield-or.gov](mailto:lpaul@springfield-or.gov)  
Co City of Springfield Planning Department  
225 Fifth Street  
Springfield, Oregon 97477

Re: Springfield UGB Expansion

Dear City Councilors and County Commissioners,

On behalf of 37 Seavey Loop farms, landowners and residents, including Bear Mountain Honey, Demetria Brock, Scott Brock, Rob Castleberry, Cliffard Cole, Jonquil Cole, Anna Lawrence, Kathryn Davis-Lumsden, Jim Evonuk, Darlene Gilman, Ron Gilman, Don Hansen, Marla Hansen, John Helmer, Normandy Helmer, Kim Herrick, Gayle Landt, Bethany Little, Charles Little, Cristman Lumsden, Karen Lundblad, Pam McBee, Ron McBee, Lucy McIver, Mary Moore, Scott Moore, Daniel O'Connell, Beverly O'Connell, Debra Orlowicz, Penny Jennings, Martin Jones, Theo Martin, Katie Mason, Larry Norris, Charles Stewart, Joyce Thomas and Jim Weaver, please accept these comments on the proposed Springfield Urban Growth Expansion and associated documents, including the 2030 Refinement Plan text and diagrams implementing HB 2007 Or Laws Chapter 650 (HB 3337), ORS 197.295 to 197.314, the City's Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis. Please add this letter to the record on this matter. I also request mailed notifications regarding any work sessions, public hearings, and/or final decisions on this matter.

### I. Background

Despite widespread opposition and a failure to satisfy relevant legal criteria, the City of Springfield has set its sights on the Seavey Loop area to supply industrial lands allegedly needed to target various industries and accommodate employment forecasts. The Seavey Loop area is a much valued pillar of the region's agricultural and recreational community, and the area's contribution to the residents of Springfield, Eugene, and Lane County is invaluable. This can be

contrasted with alternative sites that do not contain the same resource and recreational values and where there are willing participants in expansion. Despite Seavey Loop's value to the City and region and the failure to satisfy all legal requirements, the City is considering degrading the Seavey Loop area by converting the area to industrial uses. The City's focus on Seavey Loop is misguided for many reasons, as set forth below.

## II. The Social Value of Seavey Loop is Incompatible With the Proposed UGB Expansion

### A. The Seavey Loop Area is an Important and Valued Agricultural Area

The Seavey Loop area contains significant acreage zoned for exclusive farm use. In 2002, Lane County had approximately \$88 million in total gross sales from agriculture, some of which is directly attributable to the Seavey Loop area and under threat from the proposed industrial uses. Given the State of Oregon's diminishing stock of farmland in recent years, the City and the County should be protecting, not degrading valued farmland, especially when the justification is based on an inflated needs analysis for industrial land. The proposed industrial uses are incompatible with the many small family farms that directly benefit the Cities of Springfield and Eugene and represent the very type of sustainable businesses the City and County should be encouraging. Industrial uses would degrade the area by contributing to noise, light, air, water, and soil pollution. For example, increased surface area from large-scale industrial uses would adversely affect Oxley slough, a water body from which many farm operations draw water. Polluting Oxley slough will degrade agriculture uses and likely harm species associated with the slough and the Willamette River. The City should be directing its 20-year needs on infill and efficient measures to preserve surrounding farmland and resource uses. The City's current focus on Seavey Loop serves to jeopardize the local agricultural industry and family farms.

### B. The Seavey Loop Area is an Important and Valued Recreational Area

The Seavey Loop area is the gateway and open space buffer to Mt. Pisgah, described by Mount Pisgah Arboretum as "[o]ne of the shining jewels of Lane County." Mt. Pisgah sits within the Howard Buford Recreation area, adjacent to the proposed industrial uses. The 2,363-acre Howard Buford Recreation Area is the largest of Lane County's parks. The proposed industrial uses would sacrifice the aesthetic and environmental character of Lane County's most significant park. Converting the Seavey Loop area to industrial development would sacrifice wetlands, hydric soils, and significant floodplains.

### C. Widespread Local Opposition

Widespread opposition has arisen against the Seavey Loop area's possible inclusion in the UGB expansion because of the area's agricultural and recreational value. Numerous property owners in the Seavey Loop area, as well as residents of Springfield, Eugene, and Lane County, are opposed to the UGB expansion, including the owner of the largest parcel in the area under

consideration. The City has actively sought willing participants for the UGB expansion, and, at alternative sites (e.g., the Gateway site), has willing participants for large sites. The City would force itself into an awkward corner if it proposed to expand its UGB to include unwilling participants. The largest Seavey Loop area parcel was critical to the City's most recent analysis of suitable acres, creating one of the larger sites, but that analysis was premised on the notion that the largest parcel owner was a willing participant. That is no longer the case. As noted above, the Seavey Loop is a much valued agricultural and recreational asset of the region. The area is also an important environmental attribute because it also contains wetlands, many of which have not been acknowledged by the City. The vast majority of the area under consideration contains hydric soils, wetlands, and floodplains designated by FEMA, and Oxley Slough empties into essential fish habitat. Industrial uses would be incompatible with and degrade these environmental qualities.

### III. The City Must Use Lands Inside the UGB Before Considering Expanding

The City must first use lands inside the UGB before expanding. It is not sufficient that land outside a UGB may even be significantly better for a particular use than lands already inside the UGB, if those lands are inside the UGB can reasonably be redesignated for the needed use. See *DLCD v. Douglas County*, 36 Or LUBA 26, 36-37 & n.14 (1999); *BenjiFran Development v. Metro Service Dist.*, 17 Or LUBA 30, 49 (1988), *aff'd*, 95 Or App 22 (1989). The local government must consider whether the new urban needs can be met on land already inside the UGB. The local government must look at vacant and redevelopable land, and whether land can be used more efficiently, for example, up-zoned. *1000 Friends v. City of North Plains*, 27 Or LUBA 372, 390, *aff'd*, 130 Or App 406 (1994). If there is surplus land in one land use category inside the UGB, the local government must consider rezoning that land to meet the need. See *BenjiFran Development v. Metro Service Dist.*, 17 Or LUBA 30, 49 (1988), *aff'd*, 95 Or App 22 (1989); *DLCD v. Douglas County*, 36 Or LUBA 26, 34-35 (1999); *DLCD v. Douglas County*, 36 Or LUBA 26, 43 (1999) ("It is inconsistent with Goal 14, factor 3 to include the subject property within the UGB if (1) required public facilities and services would have to be upgraded or extended to serve the subject property and (2) alternative sites within the UGB which could accommodate the identified need already have required public facilities and services."). *DS Parklane Development, Inc. v. Metro*, 35 Or LUBA 516, 575 (1999), *aff'd as modified*, 165 Or App 1 (2000) ("In comparing possible expansion areas under this factor, relative financial cost is a relevant criterion.").

Efficient use of land inside the UGB is important because the City has not adequately demonstrated that the City must expand to satisfy the 20-year planning period. Here, the City's alleged industrial land need exceeds what is necessary to satisfy the 20-year employment forecast. Normal industrial job density is from 5-20 employees per acre, but the Economic Opportunities Analysis claims that for sites 20 acres and larger, 450 acres of land are needed for only 375 new industrial workers. The City's justification for sites 20-50 acres is extremely generous, amounting to roughly 7 employees for each 20-50 acre site. This is an extremely low

employee per acre figure, which is unsupported by the record. The City, in essence, alleges it needs 10 times more land than is reasonable to satisfy its needs. The City is only to provide enough land that is *needed*, and, here, the City is asking for much more. It also appears as though the City is narrowing its focus on suitable land within Seavey Loop, but the analysis in the Economic Opportunities Analysis and Commercial and Industrial Buildings Inventory has not been updated to reflect the focus on suitable lands.

IV. The City Has Not Adequately Considered Whether Assembly of Smaller Sites within the UGB can Satisfy the City's Needs

The City has not demonstrated that industrial lands of small acreage within the UGB cannot be assembled to satisfy the lands allegedly needed. The City has not pointed to examples in its inventory to demonstrate where the City proposed assembling smaller parcels to create 20-acre and greater parcels.<sup>1</sup> The City acknowledges that there is a surplus in every category except the greater than 50-acre size range, but there is nothing to demonstrate that the greater than 50-acre category cannot be met through assembly of smaller acres. Indeed, there is nothing unique about the Seavey Loop area that would allow large acreages to be created absent assembly, and, therefore, it only makes sense that the City should demonstrate that it has attempted to assemble lands within the UGB before focusing on an area that would require it to assemble small parcels, assuming those property owners are willing participants.

V. The Seavey Loop Area does not contain large parcels in single ownership that do not object to a UGB expansion

The City apparently concedes that only a single 50-acre site is available for expansion in the Seavey Loop area, but this 50-acre site would be assembled through different landowners, some of which do not support the UGB expansion. The Seavey Loop area does not contain single large parcels, as do the alternative sites. Instead, Seavey Loop is comprised of smaller parcels with many property owners objecting to be included in the UGB expansion. According to the City, there is a preference for lands with a single owner to reduce the cost of land assembly, yet no single willing owner can provide sufficient or adequate acreage to effect the City's alleged need. It makes little sense, therefore, to focus on Seavey Loop given the fact that the area does not contain sufficient land to satisfy the City's alleged need – even if assembled – to create the large parcels allegedly needed. According to the City's own rationale, Seavey Loop should not be on the table at this point. In this respect, Seavey Loop stands in contrast to the Gateway site, which contains large parcels and willing participants.<sup>2</sup>

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<sup>1</sup> It is important to note, however, that the City has not demonstrated that the maximum acreage in the categories sought is appropriate, instead of a lower acreage. As noted elsewhere, the City has assumed that it would need the maximum acreage in any category.

<sup>2</sup> In addition, the Gateway site does not contain the significant amount of hydric soils that the Seavey Loop area contains.

VI. The City has not Satisfied OAR 660-009-0015(3)

OAR 660-009-0015(3) requires that:

“Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.

(a) For sites inventoried under this section, plans must provide the following information:

- (A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;
- (B) A description of any developed constraints of infrastructure needs that affect the buildable area of sites in the inventory; and
- (C) For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.

The City’s analysis falls far short of what is required under OAR660-009-0015(3). There is no way to determine how the City’s analysis reached its conclusions from the data provided to the public. Without identifying a list of tax lots that comprise the vacant redevelopable inventories, the acreage of each, and the rationale for its exclusion, it is not possible to comply with OAR 660-009-0015(3). Furthermore, it is not possible for the public to review the data and determine whether smaller parcels within the UGB can be assembled to create the larger parcels allegedly needed. The scale and detail of the maps utilized is too small, and the Economic Opportunity Analysis contains conclusions without the supporting data or rationale necessary to pass legal muster.

VII. The City Relies on Low Density Assumptions to Inflate the Acreage Allegedly Needed

The City relies on low density assumptions for employees per acre. This inexorably leads to inflated land needs in violation of the OAR 660, division 9. The problem is that the City is relying on an existing assumption of employable figures that far exceeds historic data. The City’s analysis alleges a job density of 13 jobs per acre, which conflicts with the existing 24 jobs per acre. The City’s unsubstantiated figures must be reconciled with existing figures to be credible and based on substantial evidence.

VIII. The Seavey Loop Area is the Worst Proposal out of the Various Study Areas as it Relates to Public Facilities and Services

The Seavey Loop area should not be under consideration due to the difficulty (and in some circumstances, the impossibility) of providing public facilities and services. Currently, the

Seavey Loop area contains no public services and facilities adequate to satisfy large industrial developments. Under OAR 660-009-0005(9), “serviceable” means “the city or county has determined that *public facilities* and transportation facilities, as defined by OAR chapter 660, division 011 and division 012, currently have adequate capacity for development planning in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.” (emphasis added). “Suitable” means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.” OAR 660-009-0050(12). Here, the Seavey Loop land cannot be “serviceable” or “suitable” because the land does not contain adequate public facilities and services. Indeed, amongst the various study areas, Seavey Loop ranks among the worst for public facilities and services and would likely cost millions more than other proposed sites.

The public facilities and services required of the proposed industrial uses in the Seavey Loop area are prohibitively expensive, and the City generally attempts to sidestep the numerous issues associated with the lack of public facilities and services in the Seavey Loop area. For example, the City’s analysis states:

Provision of public facilities and services can impact a firm’s decision on location within a region but ECO’s past research has shown that businesses make locational decisions primarily based on factors that are similar within a region. These factors are: the availability and cost of labor, transportation, raw materials, and capital. The availability and cost of these production factors are usually similar within a region.

Once a business has chosen to locate within a region, they consider the factors that local governments can most directly affect: tax rates, the cost and quality of public services, and regulatory policies. Economists generally agree that these factors do affect economic development, but the effects on economic development are modest. Thus, most of the strategies available to local governments have only a modest effect on the level and type of economic development in the community.

This analysis fails to give adequate consideration to the public facilities and services issue. First, the analysis does not disclose the past research that shows “that businesses make locational decisions primarily based on factors that are similar within a region,” or why this issue would matter to any extent given that the availability of public facilities and services is a requisite consideration. The analysis attempts to place other factors above the requisite considerations provided by relevant goals and administrative rules.

Regardless of this initial failure, the public facilities and services considerations demonstrate that the Seavey Loop area is not appropriate for the proposed industrial expansion, and creating the proposed services is prohibitively expensive.<sup>3</sup> For example, there is no existing

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<sup>3</sup> The City has not identified any funding – let alone the significant funding that would be required – to provide for efficient placement of public facilities and services.

water service, a sewer extension would be necessary, upgrades to the pump station would be required, a flood study would be required, infrastructural planning would be necessary, limited discharge opportunities, and there is a limited capacity for transportation needs. In the analysis' rating for the various study areas, Seavey Loop contains four of the most difficult issues to overcome, including fire and life safety, transportation systems, wastewater systems, and water systems. The City's analysis acknowledges that it will be unable to provide fire and safety services. For water source, storage, and transmission, the Seavey Loop area is designated as difficult, tied with the worst rating among alternative sites. For transportation systems, the Seavey Loop area is listed at > \$20 million for the I-5/30<sup>th</sup> Interchange; railroad grade separation; and the bridge over the river. These costs are significant in comparison to other sites should have removed the Seavey Loop area from consideration.

#### IX. The Seavey Loop Area Contains Wetlands and Significant Hydric Soils

The City has not adequately identified the wetlands contained in the Seavey Loop area properties. This is of the utmost importance because wetlands are an absolute constraint on consideration for inclusion in the UGB expansion. The Seavey Loop area contains significant hydric soils throughout the Seavey Loop area. Hydric soils are a strong indicator of the presence of wetlands. The three essential characteristics of wetlands are hydrophytic vegetation, hydric soils, and wetland hydrology. Hydric soils that have been converted to other uses should be capable of being restored to wetlands. Hydric soils are defined by the National Technical Committee for Hydric Soils as soils that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part. These soils, under natural conditions are either saturated or inundated long enough during the growing season to support the growth and reproduction of hydrophytic vegetation.

At the very least, if the City is going to consider wetlands as an absolute constraint, then the City must pursue further the implications of the presence of hydric soils. It is also important to understand that, in contrast to the Seavey Loop area, the Gateway parcels contain very little land that contains hydric soils. Once all wetlands are identified and indicators of wetlands analyzed by the City, the Seavey Loop area should no longer be under consideration because wetlands are an absolute constraint. At the very least, to use wetlands as an absolute constraint and fail to pursue clear indicators of wetlands in the Seavey Loop area would be an arbitrary application of absolute constraints.

Landowners have also submitted information identifying wetlands on specific parcels, including the single largest parcel in the Seavey Loop area, yet the City has not identified those parcels as containing wetlands. The Parks and Recreation Department determined, in its serviceability analysis, that a large amount of wetlands and floodplains exist in the Seavey Loop area, but the City's analysis appears to overlook this disclosure, as well as the existence of hydric

soils throughout the Seavey Loop area. Therefore, the City must demonstrate that the hydric soils are not, indeed, wetlands before considering any of the Seavey Loop area in the proposed UGB expansion.

X. Proposed Target Industries do not Require the Proposed Needed Land

The City has not demonstrated that the target industries would require the acreage allegedly needed. In other words, the City's allegations that various needed areas would require particular acreages overestimates the lands allegedly needed. The City acknowledges that some of the areas sought would likely be compartmentalized into smaller parcels, yet the City assumes it needs greater acreage. For example, the City states that it "will need employment land with characteristics that cannot be found within the existing UGB," and the City would like "to build on the developing health care cluster, promote development of high-tech businesses, and attract sustainable businesses; but the City also admits that "[i]ndustrial sites may be used for one firm or may be used for an industrial park, to provide space for multiple, smaller firms." First, this indicates that the City anticipates using smaller parcels amongst larger parcels, which indicates that the City is overinflating its acreage needs. Second, the City's analysis begs the question of why these "sustainable businesses" require 50 or 100 acres, especially when the City assumes that it will need only smaller parcels within the largest acreages. Table C-5 contains only conclusions about acreage of firms in selected industries. There does not appear to be any supporting data for these conclusions. Furthermore, while the City alleges to need three 100-acre sites, only one industry apparently needs a parcel of that size e.g., Electronics – Fab Plants, 50-100 acres. Unless the City is proposing to attract three fabrication plants, then it would appear that the City has overestimated its alleged needed acreage and overstepped its legal authority.

XI. The City presumes it Needs the Greatest Acreage in Every Category of Alleged Need

The City presumes that for every category that it allegedly needs to satisfy its industrial needs, the City maintains that it needs the maximum acreage. In Table 5-3, the comparison of employment land supply and site needs, the City alleges that for the 20-50 acre sites appear to presume that the City would need all 50 acres, and for the greater than 50 acre parcels, the City presumes that it would need 100 acre sites.

Table 4-1 of the Employment Opportunity Analysis presents conclusory citations to a broad range of acreages needed for various business clusters. For example, small scale manufacturing would require from less than 1 acre to 10 acres; call centers would require sizes ranging from fewer than 5 acres to 20 acres; tourism would require a range from sites of less than 1 acre in existing developments to larger sites (5 acres or more) for hotels; high tech site needs range from sites of 1 acre or less in existing developments to large sites (50 acres or more) for large existing businesses or data centers; wood products need ranges from sites of 2 acres or less to industrial sites of 20 acres or more; and biotech would need a range from sites 1 acre or less to large sites 20 acres or more. These are conclusory numbers without any comparative analysis



about acres of existing target industries, and, therefore, there is no evidence to support the City's conclusions.

Table 5-2 purports to identify the average size of needed sites, but fails to demonstrate why the average acreage needed for sizes of 5 to 20 acres is 15.0 acres, 20 to 50 acres is 50.0 acres, and greater than 50 acres is 100.0 acres. There is no data regarding the actual size of existing and industrial sites that exceed 50 acres or an explanation of the size of needed sites for new industries expected to relocate or establish new operations in Springfield during the planning period. Assuming these large sites must be 100 acres could limit the City's opportunities to identify suitable industrial sites and lead to an overestimate of the amount of land the City needs for industrial development. Furthermore, absent some rationale as to why the City is favoring the largest sized parcel in each category, the City will not have carried its burden.

## XII. The City Must Provide an Adequate Comparative Environmental, Energy, Economic and Social Consequences Analysis

The City must provide an adequate comparative environmental, energy, economic, and social consequences analysis. This requires the local government to determine the long-term consequences of urbanizing the proposed site with the consequences of locating the proposed use on the other lands outside the UGB on listed topics, and identify the nature and intensity of the uses proposed for the UGB expansion. *See 1000 Friends of Oregon v. City of North Plains*, 27 Or LUBA 372, 390-391 (1994). When performing this analysis, the City must consider and disclose the full range of environmental, energy, economic, and social consequences of including the Seavey Loop area into the UGB. This includes the widespread opposition by local residents, pollution to Oxley slough, contamination of essential fish habitat, high price of providing services (as well as the complete inability to provide other services, such as fire and life safety services), and so forth. Once the analysis is performed, the analysis will demonstrate that Seavey Loop is not an appropriate area in which to expand the UGB.

## XIII. The City's Analysis Omits Significant Redevelopment Sites

The Economic Opportunities Analysis summary Table 5-1 contains significant errors. The analysis states that Springfield has only five redevelopable 5-20 acre parcels, one 20-50 acre parcel, and nothing over 50 acres. However, the EOA's more detailed Table 2-10 of redevelopable land (and accompanying map 2-6) show eleven 5-20 acre parcels, two 20-50 acre parcels, and one 90-acre parcel. There is no explanation for removing the six 5-20 acre parcels, the 20-50 acre parcel, and the 90-acre parcel from the table 5-1 summary table. Because these sites are capable of meeting a portion of Springfield's industrial land need, the Economic Opportunities Analysis is fundamentally flawed.

#### XIV. Locational factors

Though the goal 14 locational factors are not properly viewed as separate approval criteria, the factors must be considered and balanced in deciding where to expand a UGB. The locational factors require a comparison of alternative sites and consideration of which of the alternatives will be more compatible with farm and forest uses. As demonstrated above for public facilities, the City has not prepared an adequate analysis or consideration of the locational factors.

#### XV. Floodplain Development and Water Pollution Development

Much of the Seavey Loop area is designated as floodplain by FEMA. The proposed industrial uses will degrade the floodplain and contribute to water pollution in shallow wells and essential fish habitat. Increased asphalt for proposed industrial uses will result in significant stormwater discharge that will adversely affect Oxley slough and essential fish habitat, as well as harm existing wetlands.

#### XVI. Traffic

Expanding the UGB to include the Seavey Loop Area will increase traffic throughout the area. The Seavey Loop area currently has insufficient transportation infrastructure to support existing or proposed uses, and providing for the public facilities necessary to ensure safe and efficient transportation would be prohibitively expensive.

#### XVII. Nodal Development and Reducing the City's Reliance on the Automobile

The analysis does not appear address the City's nodal development strategy, which is the region's locally adopted device to comply with the Transportation Planning Rule (OAR 660, division 12) and Statewide Planning Goal 12. The nodal development strategy, contained in the region's transportation system plan, is the City's approach to reducing reliance on the automobile. The relationship between the land need analyses in the Economic Opportunities Analysis and the City's strategy to encourage higher-density development and redevelopment in nodes is mentioned but not analyzed. None of the applicable roads contain a shoulder for bicyclists, and the City has not demonstrated how the nodal development strategy would address the lack of bicycling infrastructure.

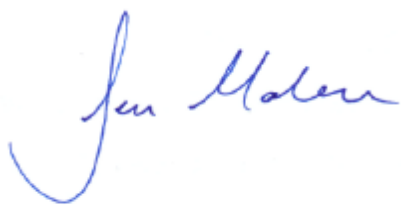
#### XVIII. The City Failed to Use its Employment Forecast to Predict Needed Lands

The City alleges that it "tangentially" used its employment forecast for its land needs analysis. Though it does not appear that the City even used the employment forecast "tangentially," even if it had done so, OAR 660-009-0015 requires more than such a tenuous connection between the employment forecast and the land need prediction.

XIX. Conclusion

The Seavey Loop area does not satisfy the criteria to be considered as part of the UGB expansion – from both a practical and legal perspective. Continued focus on Seavey Loop for inclusion in the UGB will likely only result in further opposition from residents within Seavey Loop, Springfield, Eugene, and Lane County. From its social values as an agricultural and recreational asset to its lack of large parcels with willing participants, the Seavey Loop area does nothing to satisfy the City’s alleged needs. The City’s analysis overestimates its needs and fails to demonstrate to the public that assembly of parcels within the UGB is not feasible. As a result, the City should no longer consider the Seavey Loop area for consideration, and return its focus to parcels within the UGB or alternative locations.

Thank you,



Sean T. Malone

Attorney for Bear Mountain Honey, Demetria Brock, Scott Brock, Rob Castleberry, Clifford Cole, Jonquil Cole, Anna Lawrence, Kathryn Davis-Lumsden, Jim Evonuk, Darlene Gilman, Ron Gilman, Don Hansen, Marla Hansen, John Helmer, Normandy Helmer, Kim Herrick, Gayle Landt, Bethany Little, Charles Little, Cristman Lumsden, Karen Lundblad, Pam McBee, Ron McBee, Lucy McIver, Mary Moore, Scott Moore, Daniel O’Connell, Beverly O’Connell, Debra Orlowicz, Penny Jennings, Martin Jones, Theo Martin, Katie Mason, Larry Norris, Charles Stewart, Joyce Thomas and Jim Weaver

cc:

Elisabeth Holmes, Blue River Law

clients